

Serial No.: 10/821,933
Docket No.: 101-1029
Amendment dated September 6, 2005
Reply to the Office Action of August 10, 2005

REMARKS

Introduction

Claim 28 has been added, and claims 8-10, 21, and 27 have been amended for clarification. Claims 1-15 have been allowed and claims 18-21 and 23-27 contain allowable subject matter. Claims 1-28 are pending in this application.

No new matter has been introduced in this amendment since all amendments are supported by the originally submitted specification.

Rejection under 35 USC §102

Claims 16, 17 and 22 have been rejected under 35 U.S.C. §102(e) as being anticipated by Enomoto et al., U.S. Patent No. 6,674,983. This rejection is respectfully traversed for at least the reasons stated below.

Regarding independent claim 16, at item 2 of the Office Action, the Examiner alleges that Enomoto et al. discloses "an image forming apparatus comprising first through third doors (i.e. cover 43, 85, 72, Fig. 6) to access disposables; and a fourth door 85 to access a sheet transport unit."

It is respectfully submitted that FIG. 5 of Enomoto et al. illustrates a top cover 43 that can be opened to facilitate replacement of a process cartridge 42. A photoconductor drum 21, a charging unit 22, a developing unit 24, and a cleaning unit 27 are all integrally formed in the process cartridge 42 and are replaced through the top cover 43. FIG. 6 of Enomoto et al. also illustrates a paper feeding cassette 72 and an intermediate transfer tray 85. The paper feeding cassette provides access to a paper-feeding mechanism 73 and the intermediate transfer tray 85 provides access to a paper transporting passage 81, as illustrated in FIGS. 7 and 13 of Enomoto et al., respectively. However, the paper-feeding mechanism 73 and the paper transporting passage 81 of Enomoto et al. are not disposable, and therefore, the paper feeding cassette 72 and the intermediate transfer tray 85 of Enomoto et al. do not do not provide the ability to "access disposables," as recited in independent claim 16 of Applicants' invention. Accordingly, Enomoto et al. is limited to accessing disposables only through one single top

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cover 43. Therefore, Enomoto et al. fails to teach or suggest, among other things, "first through third doors to access disposables," as recited in independent claim 16 of Applicants' invention. "A claim is anticipated only if each and every element as set forth in the claim is found either expressly or inherently described in a single prior art reference." Verdegaal Bros. v. Union Oil Co. of California, 814 F.2d 628, 631, 2USPQ2d 1051, 1053 (Fed. Cir. 1987). "The identical invention must be shown in as complete detail as contained in the... claim." Richardson v. Suzuki Motor Co., 868 F.2d 1226, 1236, 9 USPQ 2d 1920 (Fed. Cir. 1989). "The elements must be arranged as required by the claim..." In re Bond, 910 F.2d 831, 15 USPQ2d 1566 (Fed. Cir. 1990). Accordingly, since Enomoto et al. does not teach every element as recited in independent claim 16, Enomoto et al. can not be properly used to reject claim 16 under a 35 U.S.C. § 102 rejection. Therefore, it is respectfully submitted that independent claim 16 is allowable over Enomoto et al., and withdrawal of this rejection and allowance of this claim are earnestly solicited. Further, for at least the reason that claim 17 depends from allowable claim 16, claim 17 is also allowable, and withdrawal of the rejection of this claim and allowance thereof are earnestly solicited.

Regarding independent claim 22, at item 2 of the Office Action, the Examiner alleges that Enomoto et al. discloses "an image forming apparatus comprising first through third doors (i.e. cover 43, 85, 72, Fig. 6) to access disposables; and a fourth door 85 to access a sheet transport unit wherein the doors provided [sic] on top, left, front, and right sides of a housing of the image forming apparatus."

It is respectfully submitted that FIGS. 1-6 of Enomoto et al. illustrate a paper feeding cassette 72 and an intermediate transfer tray 85 which open at a front of an image forming apparatus and a top cover 43 which opens at a top of the image forming apparatus. The image forming apparatus of Enomoto et al. is not illustrated as having any additional doors. Furthermore, although FIG. 2 of Enomoto et al. illustrates supporting walls 52 disposed on left and right sides of the image forming apparatus, nowhere in Enomoto et al. are these supporting walls 52 illustrated as being able to open. Therefore, Enomoto et al. fails to teach or suggest, among other things, "first through fourth doors provided to open left, top, front and right sides of a housing of the electrophotographic printer," as recited in independent claim 22 of Applicants'

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invention. Accordingly, since Enomoto et al. does not teach every element as recited in independent claim 22, Enomoto et al. can not be properly used to reject claim 22. See anticipation requirement *supra*. Therefore, it is respectfully submitted that independent claim 22 is allowable over Enomoto et al., and withdrawal of this rejection and allowance of this claim are earnestly solicited.

New Claim 28

Claim 28 has been newly added. New claim 28 depends from independent claim 16, which, as respectfully submitted above, is allowable. Accordingly, it is respectfully submitted that new claim 28 is also allowable over the prior art of record, and allowance of this claim is earnestly solicited.

Conclusion

There being not other objections or rejections, it is submitted that the application is in a condition of allowance, and an early action to this effect is courteously solicited.

A fee of \$50 has been incurred by this Amendment. Please charge the same to our deposit account number 502827.

Should any questions remain unresolved, the Examiner is respectfully requested to telephone Applicants' attorney.

Respectfully submitted,

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